

REMARKS/ARGUMENTS

Claims 1-25 are pending in this Application.

Claims 1-25 remain pending in the Application after entry of this Amendment.

No new matter has been entered.

In the Office Action, claims 1-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,961,330 (hereinafter "Cattan") in view of U.S. Patent Application Publication No. 2001/0056508 (hereinafter "Arneson").

Claim Rejections Under 35 U.S. C. § 103(a)

Applicants respectfully traverse the rejections to claims 1-25 and request reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) based on Cattan in view of Arneson. Applicants respectfully submit that Cattan and Arneson, either individually or in combination, fail to disclose one or more of the claim limitations recited in each of claims 1-25. These differences, along with other difference, establish that the subject matter as a whole of claims 1-25 would not have been obvious at the time of invention to a person of ordinary skill in the art.

Applicants respectfully submit that Cattan and Arneson, either individually or in combination, fail to disclose or suggest the limitation recited in amended claim 1 of "storing message state information at the computer system that is unique to a message to be sent to a device." As recited, the stored message state information provides a message identifier automatically generated by the computer system to uniquely identify the message to be sent to a device and a mapping between the message identifier automatically generated by the computer system and the stored action information.

Applicants respectfully submit that Cattan does not disclose or suggest that session resolution table 1405 stores message state information that is unique to a message to be sent to a device as recited in amended claim 1. The Office Action alleges that the recited message state information is shown in FIG. 8 of Cattan. In this example, the Office Action points to the ID of the mobile terminal and the SMS destination address of the application which are mapped to a particular URI. However, simply storing the ID of the mobile terminal and the

SMS destination address in session resolution table 1405 does not disclose or suggest storing message state information “that is unique to a message to be sent to a device” as recited in amended claim 1. Specifically, session resolution table 1405 of while FIG. 8 is an example in Cattan stores possible response message “for each user that is in session.” (Cattan: Col. 10, lines 35-40). In the particular embodiment, the ID number of the user in session is the ID of the mobile terminal. Thus, session resolution table 1405 will store the ID of the mobile terminal and the SMS destination address for every message sent to the mobile terminal in Cattan. Accordingly, the alleged combination of information cannot be used to retrieve the state of any given message as recited in amended claim 1.

Moreover, the Office Action merely relies upon Arneson for its alleged teaching of message identifiers that uniquely identify a message. Arneson does not disclose or suggest storing message state information that is unique to a message to be sent to a device as recited in amended claim 1.

Accordingly, Cattan also fails to disclose or suggest the limitation of “storing state information at the computer system that is unique to a message to be sent to a device, the state information providing a message identifier generated by the computer system to uniquely identify the message and a mapping associating at least a portion of the action information with the message identifier generated by the computer system” as recited in claim 1. The reasoning presented on page 3 of the Office Action is unconvincing that Cattan discloses the recited “state information that is unique to a message.” As discussed above, the Office Action correlates the recited unique message identifier with the ID of the user’s mobile terminal in Cattan on page 3, yet, on page 4 acknowledges that Cattan lacks any such disclosure of the recited unique message identifier. Moreover, a reasonable interpretation of “a message identifier generated by the computer system to uniquely identify the message” as recited excludes the ID of mobile terminal 100 of Cattan because such an interpretation of the ID of mobile terminal 100 cannot be understood to uniquely identify each SMS message.

Cattan further fails to disclose or suggest the limitation of “retrieving the stored state information that is unique to the message sent to the device using the computer system to obtain the mapping associating at least a portion of the action information with the message

identifier based on the message identifier received in the response message from the device" as recited in claim 1. The Office Action alleges on page 4 that "appropriate action information is obtained using the ID and the SMS destination address. However, the alleged "appropriate action information" is substantially different from "the stored state information" as recited in claim 1. Claim 1 recites that two types of information are stored, "state information" and "action information." Applicants respectfully request clarification of the rejection as it fails to consider the difference between the recited "state information" and the recited "action information."

Accordingly, Applicants respectfully submit that Cattan and Arneson fail to disclose each and every claim limitation as recited in claim 1. Applicants further respectfully submit that none of the cited references cure the above-discussed deficiencies of Cattan and Arneson, and thus, claim 1 is allowable over the cited references.

Applicants respectfully submit that independent claims 8, 15, and 21 are allowable for at least a similar rationale as discussed above for the allowability of claim 1, and others. Applicants respectfully submit that dependent claims 2-7, 9-14, 16-20, and 22-25 that depend directly and/or indirectly from independent claims 1, 8, 15, and 21 respectively, are also allowable for at least a similar rationale as discussed above for the allowability of the independent claims. Applicants further respectfully submit that the dependent claims recite additional features that make the dependent claims allowable for additional reasons.

Unless otherwise specified, amendments to the claims are made for the purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof.

While Applicants do not necessarily agree with the prior art rejections set forth in the Office Action, these amendments may be made to expedite issuance of the Application. Applicants reserve the right to pursue claims to subject matter similar to those pending before the present Amendment in co-pending or subsequent applications.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

/Sean F. Parmenter, Reg. No. 53,437/
Sean F. Parmenter
Reg. No. 53,437

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 925-472-5000
Fax: 415-576-0300
SFP:lls
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